



State of New Jersey  
Department of Environmental Protection and Energy  
Division of Responsible Party Site Remediation  
CN 028  
Trenton, NJ 08625-0028

Scott A. Weiner  
Commissioner

Karl J. Delaney  
Director

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
NO. P 642 608 980

NOV 13 1992

Cristopher Anderson  
Director of Environmental Affairs  
L. E. Carpenter & Company  
1301 East Ninth Street  
Suite 3600  
Cleveland, OH 44144

Re: L. E. Carpenter Site  
Wharton Borough, Morris County  
Feasibility Study Report

Dear Mr Anderson:

The New Jersey Department has reviewed the outstanding issues regarding the Feasibility Study Report (FS). Specifically regarding the proposed subsurface Antimony (Sb) clean up number as described in Martin O'Neill's, WESTON, letter dated November 3, 1992; additional comments on the four (4) chapters of the FS submitted by WESTON mid-October, and the Department response to Mr. O'Neill's letter dated October 26, 1992. These comments have already been discussed with Mr. O'Neill on November 6, 1992.

1. *Proposed Subsurface Antimony number*

The modeling effort and calculations performed by Weston for estimating the adsorption of antimony (Sb) to soils was reviewed by the Department. Subsequently, a subsurface soil goal for Sb was developed based on the porewater concentration and equilibrium partition coefficient. Although the application of the MINTEQA2 model may be useful in determining relative adsorption, the assumptions utilized in Weston's computer simulation run may not be appropriate (i.e. interpolation partition coefficients). Rather than utilizing a model with significant limitations and manipulating the simulation with questionable assumptions, it is the Department's position that a more general approach such as evaluating ranking of various metals relative to soil sorption be considered in supporting the subsurface soil goal for Sb. Based on a review of the literature of retention of various metals, in a



range of soil conditions, it has been suggested that Sb may have greater soil sorption potential than other metals, (King, 1988 Retention of Metals by Several Soils of the Southeastern United States). The literature further indicated that iron oxides and clay content are more applicable than traditional parameters in estimating retention of metals to soils. Although the above reference does not provide a means of quantifying the soil retention of specific metals, it does suggest that the soil conditions associated with the L. E. Carpenter site (namely, high Fe oxides and clay content) significantly inhibit the leaching of Sb through the soil column. After a careful consideration of the soil and ground water conditions at the site, the Department finds of acceptable to apply the 340 ppm surface soil cleanup number throughout the soil column down to the water table.

2. *Feasibility Study, Section 1.6.6 Groundwater, page 1-21, para 6*

Add the following sentence to the end of the paragraph: "However, a groundwater treatment system designed for contaminant removal will include a treatment alternative for those metals detected above the groundwater clean up standard."

3. *Bis (2-ethylhexyl) phthalate (DEHP)*

The Department is firm on its decision to have monitor well MW-11d re-sampled for DEHP (semi-VO's) during the next quarterly sampling episode. DEHP is a site-wide problem, DEHP was not detected significantly in either field or trip blank (reported analysis was greater than 5x the field blank detected limit) and DEHP has been detected in up-gradient wells. The presence or absence of DEHP in MW-11d must be confirmed.

Pursuant to paragraph (24) of the Amended Administrative Consent Order dated September 1986 and as stated previously, the Department must be notified two (2) weeks or 10 working days prior to any field activities at the L. E. Carpenter site. Please notify the Department before the next round of quarterly sampling is scheduled.

4. *Subsurface Volatile Organic Clean Up Standards*

In a telephone conversation with Mr. O'Neill on November 6, 1992 I indicated that the subsurface clean up standards for xylene and ethylbenzene were in the process of change. Although the portions of the clean up standards are being revised, the Department cannot determine if these numbers will change at this time. Therefore, the original subsurface clean up standards of (10) and (100) for xylene and ethylbenzene respectively will not be changed.

As agreed to in our last meeting, L. E. Carpenter will be submitting the revised Final Feasibility Study on November 17, 1992. Should you have any questions regarding the above

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issues, please feel free to contact me at (609) 633-1455. Thank you for your continuing cooperation.

Sincerely,



Christina H. Purcell, Case Manager  
Bureau of Federal Case Management

cc: Martin J. O'Neill, WESTON  
John Prendergast, BEERA  
George Blyskun, BGWPA  
Jonathan Josephs, USEPA

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